

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Materials Management
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SENT VIA E-MAIL ONLY

OCT 25 2019

Mr. Ariel Iglesias (iglesias.ariel@epa.gov)
Director
Land, Chemicals and Redevelopment Division
U.S. Environmental Protection Agency, Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Re: RCRA Subtitle C Grant No. D-96292419
Semi-Annual Progress Report

Dear Mr. Iglesias:

Enclosed is the semi-annual progress report for the New York State RCRA Subtitle C Hazardous Waste Management Grant for the period April 1, 2019 to September 30, 2019.

The report summarizes the RCRA-C work accomplished during this reporting period that relates to the approved New York State Department of Environmental Conservation (Department) work plan.

The Department will continue to work closely with the United States Environmental Protection Agency to improve the implementation of the RCRA-C Program in New York State.

Thank you for your continued assistance.

Sincerely,



David Vitale
Director
Division of Materials Management

Enclosure



Department of
Environmental
Conservation

New York State Department of Environmental Conservation (DEC)
Albany, New York 12233-7056
RCRA Subtitle "C" Grant Report

Semi-Annual Progress Report
April 1, 2019 to September 30, 2019

I. Better Waste Management and Restoration of Contaminated Sites

A. NYCRR Part 373 Permit Activities (Including New Capacity Permits)

Status of Outputs to Date:

See Attachment 1 – RCRA Permit-Order Projects

This report provides notable permit milestones including Completeness Review, Public Notice, Hearing, Permit Issuance/Denial, RCRA Closure for pending new permits or renewals. It also reports on Consent Orders executed in lieu of permits.

Orders executed in lieu of permits:

FMC Corporation, Middleport, NY – Post Closure – June 6, 2019

Moench Tanning, Gowanda, NY – Post Closure – September 23, 2019

See Attachment 5 – Operating, Post Closure, and Corrective Action Permit Universe

This report provides the status of all permits including Operating, Post Closure, and Corrective Action Permits.

In all permit categories, some of the expected completion goals have been updated for completion during next year's work plan. For those completion goals that remain in this year's work plan the Department will seek to complete them during the next reporting period.

B. Corrective Action

Status of Outputs to Date:

See Attachment 3 – RCRA Corrective Action Remedial Project Tracking

In the SFY 18/19 Work Plan, DEC provided projections of RCRA Corrective Action Remedial Projects (CA610, CA550, CA650) based on the universe we are tracking. This report provides the actual completions.

See Attachment 4 – RCRA Site-wide Reporting

In the SFY 18/19 Work Plan, DEC provided projections of potential Environmental Indicators (CA400, CA550, CA725, CA750, CA800 and CA999) based on the universe are tracking. This report provides the actual completions.

The Department will seek to meet those goals missed, during the next reporting period.

C. Quality Assurance Program

Status of Outputs to Date:

1. Continued implementation of the EPA approved QA Program: As indicated in the Quality Management Plan, field sampling is performed in a manner consistent with the project specific Quality Assurance Project Plan (QAPP), which is reviewed and approved by the project manager, with assistance from DEC chemists as needed. Analytical data submitted to DER is accompanied by a Data Usability Summary Report (DUSR) and reviewed by project managers, with assistance from DER chemists as needed. An accounting of the quality assurance projects completed during this reporting period is provided below.

Type	Reporting Period 4/1 – 9/30	Reporting Period 10/1 – 3/31	Totals to Date
QAPP	1		1
Data Review	11		11
Technical Support	4		4
Lab SOP Review	3		3
WAP Review	2		2

D. State Program Development

Status of Outputs to Date:

1. RCRA-Regulations:

DEC is revising State hazardous waste management regulations to continue to be at least as stringent as the federal RCRA-C regulations. Work in 2018-19 included revising a package of updates to state regulations, referred to as Fedreg5. This rulemaking was proposed on June 12, 2019. The public comment period ended on August 26, 2019. The regulations are expected to be finalized and effective in early 2020. This package addresses regulatory changes from 38 federal registers and approximately 80 state initiatives. The June 2014 Cathode Ray Tube Export rule is also included in this rulemaking. DEC has conducted public outreach, including webinars and public meetings on a second round of regulatory updates, referred to as Fedreg6, to address major regulatory changes that EPA has published since 2012. Included in Fedreg6 are the Solvent Contaminated Wipes Rule; the Carbon Dioxide Sequestration Rule; the Electronic Manifest Rule; the 2008 Definition of Solid Waste Rule, as amended in January 2015, as amended in December 2014, the 2016 Hazardous Waste Export-Import Rule Revisions, the 2016 Hazardous Waste Generator Improvements Rule, the 2018 User Fees for the Electronic Hazardous Waste Manifest System Rule, the 2018 Safe Management of Recalled Airbags Rule, and the 2019 Hazardous Waste Pharmaceuticals Rule. DEC is also considering adding aerosol cans, paints and paint waste, and solar panels, to the state universal waste rule.

2. Used Oil Regulations:

As previously discussed with EPA, authorization documents for the used oil program will be included in the Fedreg 5 authorization package, which DEC expects to submit in state FY 20/21.

DEC will respond to any questions EPA may have during the codification process of these regulations. Fedreg6, which is in preliminary public review, includes additional state-initiated and conforming changes to the State's Used Oil Management regulations.

E. Expanded Public Involvement Activities

Status of Outputs to Date:

1. There were no public information meetings regarding remedy selection held during this reporting period.
2. DEC added several webpages (Generator Rule and Pharmaceuticals Rule) and updated existing webpages (DSW Rule) that address new federal rules that DEC is considering in our next rulemaking. DEC also added a guidance webpage about the management of airbag waste under RCRA and updated an existing webpage about management of hazardous waste pharmaceuticals. Some DEC RCRA staff are participating in a two-part agency-wide initiative to update the internal and external webpages. Existing external webpages and guidance will be updated and reorganized, including a section focusing on guidance for small businesses; and internal webpages for use by DEC will be reorganized and updated with new guidance materials.
3. No action was required during this reporting period with respect to concerns from Indian Nations.

F. Strategic Plan

Status of Outputs to Date:

1. In accordance with DER-31, Green Remediation, standard green remediation elements are included in Statements of Basis for Corrective Action. We are expanding the implementation of DER-31 to our regulation of RCRA corrective actions for RCRA sites under DEC's authority.
2. Updated Permit Renewal reports are provided in Attachment 5.
3. DER has developed, and continues to maintain, several planning reports in the DER internal database, the Unified Information System (UIS), for the RCRA-C program. DMM project managers have access to and also use UIS to track and plan facility specific program milestones. Permit renewals are tracked in both RCRAInfo and UIS. DEC and EPA staff participated in conference calls and meetings relative to progress on the Environmental Indicator (EI) Determination outputs for the 2020 GPRA CA baseline facilities. Frequent review and evaluation of the status of GPRA facilities occurred during the period to refine the EI projections and review current information.

4. Corrective action planning will be provided to EPA Region 2 as described in item 3 above.

G. IT Integration

Status of Outputs to Date:

1. Continued to maintain the DEC Unified Information System (UIS) to facilitate day-to-day management of GPRA and Non-GPRA RCRA sites. DMM staff assigned to the RCRA program continue to use this system. UIS is a custom-built database used by DEC for the management of its program data. This includes data related to RCRA projects; Inactive Hazardous Waste Disposal Site projects; Brownfield projects; chemical and petroleum spill reporting; chemical and petroleum bulk storage registration; and others. As part of this effort, all existing reports were converted to an updated version of Crystal reports and server reporting software.
2. DEC continues to be available to work with EPA Region 2 to evaluate what is now known by EPA as the Smart Tools Project. As part of this evaluation, DEC is seeking travel approval for two staff to participate in a Smart Tools training to be held in Boston during December 2019.
3. DEC continues to maintain the legacy document management system (eDocs) for documents not migrated into DEC's current document management system DECDocs. DEC implemented DECDocs in 2014 and continues to work with the New York Office of Information Technology Services to refine the application. RCRA staff transferred to DMM, as well as new RCRA program staff, will be or continue to be authorized to utilize the systems.
4. DEC continues to leverage available software to maximize the electronic submission, distribution and storage of documents related to the RCRA-C program. This includes using email to the greatest extent possible.
5. DMM continues to participate in the national effort to implement electronic manifesting. DEC keeps EPA Region 2 informed of any formal correspondence between DEC and the eManifest Workgroup. DEC lost the ability to access manifest data due to the implementation of new federal laws for the e-Manifest system which preempts states from receiving manifests submitted to the new system. DEC is currently working with a contractor to access the data in e-Manifest and download it into DEC's eSmart system. Barring any unforeseen circumstances, DEC believes this project will be completed in 2020.

II. Credible Deterrent to Pollution and Greater Compliance with the Law

A. Compliance Inspections

Status of Outputs to Date:

1. Inspections

Types of Inspections	Full Year Commitment	4/1-9/30 Actual	10/1-3/31 Actual	Totals to Date
Land Disposal Facilities	7	1		1
Commercial Facilities ^{1,2}	11 ⁵	7		7
Boiler/Furnace (BIF) ^{1,2}	1	1		1
Incinerators ^{1,2}	3	1		1
Other TSDFs	7	3		3
Large Quantity Generators (LQG) ^{3,4}	65	33 ⁷		33
Other Generators/Non-Notifiers ^{3,4,6}	406	217		217
TOTAL	500	263		263

Footnotes:

- (1) This class must be inspected every year. BIF inspections will be performed by DEC's Division of Air Resources under the Title V program going forward.
- (2) The incinerator inspections will be performed by the DEC's Division of Air Resources under the Title V program going forward.
- (3) Generator inspections include exempt, ten-day transporter facilities and recycling facilities exempt from permitting.
- (4) This number is a goal, not a fixed commitment. This number is derived from Annual Reports for 2014, 2015, 2016 along with 2017 manifest data showing a 2-year alternate LQG universe of 810 facilities that filed annual reports in 2016 and shipped more than 0.1 tons of waste in 2017 or, filed at least one annual report and shipped more than 6.6 tons of waste in 2017. The inspection commitment is based upon inspecting LQGs. When targeting LQGs, DEC will take into consideration policy guidelines for inspecting all LQGs within a 5-year period. Generator status may change month-to-month. Shortfalls on LQG inspections will be made up with other generator inspections in accordance with EPA's Compliance Management Strategy.
- (5) DEC schedules two inspections per year at commercial facilities. This table only reflects the number of commercial facilities to be inspected, not the total number of inspections to be performed.
- (6) The total number of inspections includes 8 Conditionally Exempt Small Quantity Generators which just had EPA ID numbers assigned but are not yet in RCRA Info.

This LQG number reflects actual status as found. RCRA Info indicates that 60 inspections are classified as LQGs.

2. Groundwater Inspections: See Attachment 2 – RCRA Groundwater Inspection Reporting

B. Enforcement

Status of Outputs to Date:

ENFORCEMENT OUTPUT GOALS				
Type of Action	Commitment	4/1-9/30 Actual	10/1-3/31 Actual	Totals to Date
Warning Letters	225	89		89
Orders/Initial Actions	54	23		23
TOTAL	255	112		112

C. Staff Development/Training

Status of Outputs to Date:

1. DEC continued a cross-training program to provide greater flexibility and efficiencies so that other DEC inspectors can inspect specific types of RCRA facilities (e.g., certain large/small quantity generators). Staff assigned to complete RCRA inspections at any facility are provided the necessary training and are certified as appropriate. EPA reserves, and continues to have, the right to conduct oversight inspections. One new RCRA-C inspector was certified this period. NYSDEC staff from the central and regional offices took part in the RCRA Inspector Training Summit. The Joint EPA Region 2-NEWMOA Work Shop took place on June 11, 2019 at the EPA Region 2 office. Topics covered included EPA Headquarters and Region 2 updates, Land Disposal Restrictions, E-Manifest System discussion & Air Emission monitoring demonstration.
2. DEC applied FIRST efficiencies in corrective action activities wherever appropriate.
3. Records of training activities are maintained and available to EPA Region 2 on request.
4. EPA Region 2 will assist DEC in scheduling appropriate courses, as necessary, when changes are made in EPA/DEC regulations and policies.
5. Training with respect to corrective action was conducted periodically to educate program staff on the latest developments in remedial technology and with respect to emerging contaminants.
6. Enforcement data was entered into RCRAInfo as events were accomplished.

D. Technical Assistance

Status of Outputs to Date:

Responded to written and verbal requests for interpretations and determinations of the State's hazardous waste regulations. DEC responded to approximately 910 inquiries and prepared approximately 90 written responses.

DEC staff responded to fifty-five requests for "Contained-In" determinations. These requests were reviewed in a manner consistent with USEPA's Contained-In Policy for Soil and Debris Contaminated with Hazardous Waste.

E. Maintain Manifest System

Status of Outputs to Date:

Processed manifests received through a computerized tracking system (eSMART), resolved discrepancies, obtained manifests from receiving facilities to document receipt of shipment, assured all manifests received from small quantity and large quantity generators had EPA Identification numbers. Referred parties in non-compliance for appropriate enforcement action. Maintained a public website to disseminate general information and for training purposes.

Participated in the national effort to implement electronic manifesting including: providing comments on the EPA's e-Manifest User Fee Proposed Rule; answering inquiries from the regulated community; developing outreach and guidance materials; testing the e-Manifest system and reporting bugs; assessing data quality; documenting data quality issues; and contacting the regulated community to resolve data quality issues. DEC will also need to upgrade the department's eSMART system to download e-Manifest data from RCRAInfo.

DEC executed a consent order on September 17, 2019 with Consolidated Edison (Con Ed) to implement a workable solution to reduce the number of RCRA- C Provisional Identification numbers required by Con Ed and issued by EPA Region 2. The consent order allows Con Ed to use a single EPA Id number for manhole cleanouts which only have lead contamination. The order retroactively allows the use of the single ID number from July 18, 2018 onward.

F. Small Quantity Generator (SQG) Program

Status of Outputs to Date:

The activities carried out included:

- received and responded to inquiries via phone, email, and letters;
- maintained the SQG hotline and email account; and
- provided responses to approximately 50 requests for assistance per month from the regulated community.

G. Compliance Analysis and Inspection Targeting

Status of Outputs to Date:

Work has continued to ensure that long term LQGs are identified and targeted for inspection, to meet our goal of inspecting LQGs. DEC has worked with EPA Region 2 to establish a consistent method to identify LQGs using both eSMART and e-Manifest data. Quarterly meetings have been held between DEC and EPA staff to kick off the process of cooperative federalism and to ensure both DEC and EPA direct their inspection resources in the most efficient manner

H. Financial Assurance (FA)

Status of Outputs to Date

1. **Financial Assurance (FA) instrument review:** FA instruments received by DEC during this reporting period were reviewed and discrepancies were resolved by FA staff. These reviews included (a) updates to existing FA instruments where FA staff verified that prior cost estimates were adjusted annually using the appropriate inflation factor, or cost estimates were recalculated in current dollars; and (b) issuance of new instruments since the facility owners/operators continue to change financial institutions or submit different instruments to replace their existing ones. See item 1 below under 'Other FA Activities' for details regarding release letters.

FA staff verified that the language in each instrument is written as prescribed at 6 NYCRR 373-2.8. FA staff consulted with the respective DEC project manager of the RCRA-C facility to discuss FA obligations that have been submitted. FA staff also confirmed that the cost estimates provided were acceptable and consistent with FA requirements in the Part 373 permit or DEC consent order and discussed with the permit writer and/or project manager as needed. If there were discrepancies with either the FA instrument language or obligations, then FA staff contacted the facility owner/operator to address the situation. When necessary, EPA Region 2 was consulted to obtain guidance and direction on appropriate responses.

2. **RCRAInfo FA Module:** Dozens of FA cost estimate and mechanism records were added to the FA module of the RCRAInfo tracking system by FA staff based on new or updated instruments that were received by DEC during this reporting period. FA staff also addressed the list of facilities for various FA obligations that had expired FA instruments or missing cost estimates in RCRAInfo as listed in the FA Audit Report. This pertains to the continued national goal to resolve FA non-compliance for RCRA-C facilities and address data quality deficiencies in RCRAInfo for FA records. Such non-compliance could impede EPA's ability to ensure companies can pay for environmental cleanups. It is important to note that the EPA data system was developed primarily for tracking cleanup progress rather than for monitoring FA compliance.
3. **Enforcement referrals:** No referrals for enforcement actions of non-compliance were made by FA staff during this reporting period.

4. **FA conference calls:** FA staff participated in all the EPA-States FA monthly conference calls held during this reporting period, which continue to be coordinated by EPA-HQ. FA staff provided input on the following discussion items:
- (a) **Financial Test/Corporate Guarantee (FT/CG) Reviews:** When reviewing the FT/CG, it is important to verify that the required FA obligations have been identified appropriately. In recent years, EPA and states have learned that owners/operators may only include certain facilities and FA obligations, so they pass the FT. Thus, it is possible that owners/operators are not including all RCRA-C facilities (nationally) that are being covered under the respective FT/CG. DEC continues to question Olin Corporation's FT submittal where in April 2019 they requested that their existing instruments (Letter of Credit and Standby Trust Agreement) be terminated and replaced with their passing FT. However, they did not provide a complete list of facilities that are using such FT. Thus, the 2019 FT that Olin submitted to DEC did not pass, and DEC has not provided Olin with a release letter for their existing instruments.
 - (b) **Calculation of Inflation Factor:** New York continues to provide information to owners/operators of RCRA-C facilities regarding EPA's recommendation that Gross Domestic Product (GDP) be used in place of Gross National Product (GNP) per 1996 EPA policy, even though the current New York State RCRA-C regulations (which are being amended) indicate that GNP should be used. The document FA staff prepared in 2018 explains the differences between GDP and GNP, where GDP represents products made and services available within the U.S. (and not other countries). Thus, New York continues to request that owners/operators use the Implicit Price Deflator (IDP) for GDP when calculating the inflation factor for the current year. Either the quarterly or annual IPD for GDP can be used for such calculation and it is done consistently each year.

Other FA Activities

- 1. **Release Letters:** New FA instruments were received from facility owners/operators who were replacing current instruments with a new type of instrument or changing financial institutions but keeping the same type of instrument. Thus, DEC issued release letters to the respective financial institutions notifying them that their instrument is returned for termination because the owner/operator had submitted an alternative, acceptable FA. FA staff spent a significant amount of time on this activity during the reporting period since it involves the review of FA instruments, follow up with respective owners/operators, and obtaining approval of the release letter (and signature by Division Director) prior to mailing.
- 2. **Non-Renewal Notices:** DEC received Notices of Non-Renewal (Notice) from financial institutions when they were not going to renew a letter of credit under the evergreen clause written into this instrument. If FA was still required, FA staff contacted the owner/operator of the respective facility to inform them that an alternate instrument had to be submitted to DEC before the existing one expired so the owner/operator would not be in non-compliance with their FA requirements. The reason for the issuance of these Notices was that the owner/operator was replacing their instrument and thus the letter of credit did not need to be renewed and would be terminated once DEC received the original alternate FA instrument.

3. **Transfer of RCRA-C Program:** Due to a reorganization between DEC's Division of Environmental Remediation (DER) and Division of Materials Management (DMM), the RCRA-C program was transferred from DER to DMM as of February 1, 2018. During this reporting period, DER FA staff completed the training of DMM FA staff about RCRA-C FA requirements, review of FA instruments received with annual updates, and use of FA module in RCRAInfo to enter such updates. The transfer of RCRA-C FA facilities that are handled by DMM occurred on June 14, 2019 when DER delivered the paper and electronic files to DMM. Training of additional DMM staff who will be involved with FA for RCRA-C facilities is being scheduled for the next reporting period.

III. Hazardous Waste Information

A. Hazardous Waste Annual Reporting

Status of Outputs to Date:

1. A total of 2,040 New York State Hazardous Waste Annual Reports for year 2018 were received on paper or electronically (through American Resource Management's EASITRAK on-line system) and were processed through a computerized system (eSMART). Potential large quantity generators, identified from manifest records, were notified of the reporting requirement. Discrepancies were resolved, including comparison with manifest data (see Section II.E above). Due to the roll-out of emanifest, paper manifest data for the 2018 reporting year was only available through June 30, 2018. Since the interface between emanifest and eSmart has not been completed. The full year's worth of manifest data was not available to identify all potential LQGs and send out annual report reminder letters. This may result in a lower than normal number of annual report submittals.
2. A public website was maintained to disseminate general information and for training purposes.

B. RCRAInfo Implementation

Status of Outputs to Date:

1. Staff participated in the monthly RCRAInfo conference calls and continue testing V6 while ensuring V5 still works. Staff recommends using Firefox or Chrome in V6 of RCRAInfo
2. QA/QC: Staff continued auditing data entry of enforcement data for SNCs/cases, in addition to inspection, violation and NOVs. DEC staff ran data quality reports to monitor inspection, violation, enforcement, penalty, and payment (CME) information. Data corrections are made as necessary. The quality of the State's data in RCRAInfo is routinely evaluated and steps are taken as necessary to maintain and improve that information. Staff regularly run and distribute custom reports of SNCs with open violations, SVs with open violations and inspections with undetermined violations.
3. Staff assisted regional inspectors in getting NYN EPA ID Nos. for CESQGs/non-generators they inspected, to enter them into RCRAInfo.
4. DEC has been video training new RCRA inspectors on the use and requirements for CME data entry into RCRAInfo.

5. Data was entered into RCRAInfo on a timely basis
6. No changes were required to the MOU for RCRA data management during the reporting period.
7. Closure, post-closure, corrective action and financial assurance data are entered into RCRAInfo on a consistent basis.

IV. Effective Administration of the Hazardous Waste Grant

Status of Outputs to Date:

1. DEC received our funding request approval for the period April 1, 2019 to March 31, 2020 on July 9, 2019. This approval was based on the request for funding submitted to EPA on February 22, 2019. The amount requested was based on EPA available funding. Federal funding was approved at \$5,990,420. The State match is \$1,996,807, which is 25 percent of the total budget of \$7,987,227. The matching share is provided by time and activity of staff funded by the State. Of the approved amount, \$630,744 was awarded. The Final Federal Financial Reports (FFR) will be submitted within the 90- day requirement. These federal funds support approximately 36 full-time equivalent (FTE) positions.
2. DEC staff have attended meetings, conference calls and responded to email correspondence and phone calls to clarify the status of projects, reporting requirements, and other programmatic concerns.

ATTACHMENTS

Attachment 1 – RCRA Permit-Order Projects

Attachment 2 – RCRA Groundwater Inspection Reporting

Attachment 3 – RCRA Corrective Action Remedial Project Tracking

Attachment 4 – RCRA Site-wide Reporting

Attachment 5 – Operating, Post-Closure and Correction Permit Universe

Attachment 1

RCRA Permit/Order

Both GPRA and non-GPRA

Office Section

ALL

Bureau

ALL

Public Notice (OP160)

Site Code	SiteName	RCRA ID No.	BUR	Start Date	Status
130078	Hicksville Operations Center	NYD006866008	BURE	07/17/2019	ACT

Orders / in lieu of PC Permits pc300

Site Code	Document	SiteName	RCRA ID No.	GPRA Doc ID	Eff. Date	RCRA Phase	Scope
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RCRA Groundwater Inspection Reporting

State Fiscal Year: 2019/2020

GPRA/Non-GPRA: Both (GPRA and Non-GPRA)

Report Period: 4/1 - 9/30

RCRA - CME

Site No.	Site Name	RCRA ID No.	Bureau	Project Manager	GPRA	Project Name	End Date	End Status
<u>GPRA</u>								
356025	Channel Master	NYD042457788	BURC	SPELLMAN J.	Y	RCRA GWI CME	8/30/19	ACT

Non-GPRA Count: 0*Planned: 0**Actual: 0***GPRA Count: 1***Planned: 0**Actual: 1***Total - RCRA - GME 1***Planned: 0**Actual: 1***RCRA - O MI**

Site No.	Site Name	RCRA ID No.	Bureau	Project Manager	GPRA	Project Name	End Date	End Status
<u>GPRA</u>								
557011	Ciba Geigy Main Plant/Pretreatment Plant	NYD002069748	BURA	JANKAUSKAS B.	Y	RCRA GWI OMI	9/24/19	ACT
932039	Vanchlor Company, Inc.	NYD991290529	BURE	MOELLER S.	Y	RCRA GWI OMI	9/25/19	ACT

Non-GPRA Count: 0*Planned: 0**Actual: 0***GPRA Count: 2***Planned: 0**Actual: 2***Total - RCRA - O&M: 2***Planned: 0**Actual: 2*

Attachment 3

RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2019/2020

GPRA/Non-GPRA: Both (GPRA and Non-GPRA)

Report Period: 4/1 - 9/30

End Status: Actual

Remedial Design

CA 450 Design Approved

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<u>NON-GPRA</u>											
130004	RUCO Polymer Corp. (Hooker Chem)	NYD002920312	05	Offsite Soil Vapor	4/10/19	ACT				S. Scharf	BURA
<u>GPRA</u>											
558004	G.E. Fort Edward Plant Site	NYD093256063	06	Bldg Decom/Demo and Investigation of Previously	9/18/19	ACT				D. Tromp	BURD
<hr/>											
Non-GPRA Count:											1
Planned:											0
Actual:											1
GPRA Count:											1
Planned:											0
Actual:											1
Total - Remedial Design											2
Planned:											0
Actual:											2

Remedial Action

CA 550 CMI Construction Complete - *See Note Below

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<u>NON-GPRA</u>											
130004	RUCO Polymer Corp. (Hooker Chem)	NYD002920312	05	Offsite Soil Vapor	7/23/19	ACT				S. Scharf	BURA
336065	Tarkett	NYD041770629	01	Remedial Program	8/6/19	ACT	Order CA	7/10/06		J. Miller	BURC
734057	General Motors - Fisher Guide	NYD002239440	02	Upper Ley Creek and other off-facility areas (wetlds,	7/12/19	ACT				J. Luo	BURD
<u>GPRA</u>											
241130	LIRR - Morris Park Repair	NYD980641625	01	Remedial Program	9/25/19	ACT	Order CA	5/8/92		A. Barraza	BURB
734004	Crouse-Hinds Landfills	NYD002227973	01	the North and South Landfills, on-site wetlands	7/22/19	ACT				J. Luo	BURD

*For this report - CA 400 and CA 550 are NOT sitewide. Sitewide accomplishments are reported from RCRA Details.

Division of Environmental Remediation

RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2019/2020

Report Period: 4/1 - 9/30

GPRA/Non-GPRA: Both (GPRA and Non-GPRA)

End Status: Actual

915009	Bethlehem Steel	NYD002134880	04	Coke Oven Area (Groundwater)	9/11/19	ACT	Order	CA	5/10/10	A. Zwack	BURE
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Non-GPRA Count: 3

Planned: 0

Actual: 3

GPRA Count: 3

Planned: 0

Actual: 3

Total - Remedial Action 6

Planned: 0

Actual: 6

Periodic Review

CA 577 CMI Effectiveness Evaluation - *See Note Below

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau	
<u>NON-GPRA</u>												
734018	NYSDEC Three Rivers WMA; Pest. Storage	NYD980593602	00	Site Management	9/11/19	ACT				S. Fitzgerald	BURD	
907019	D.C. (Dow Craft) Rollforms	NYD002123727	00	Site Management	8/1/19	ACT				D. Szymanski	BURE	
932035	GrafTech Intl. Hlds. Inc. (formerly Unio	NYD002106920	00	Site Management	4/25/19	ACT				A. Zwack	BURE	
C905031	Olean Redevelopment Parcel 1	NYD055057665	00	Site Management	6/20/19	ACT				B. Mcpherson	BURE	
<u>GPRA</u>												
152031	Peerless Photo Products	NYD002044139	00	Site Management	7/2/19	ACT				G. Desai	BURA	
356009	Rotron - Woodstock	NYD001223692	00	Site Management	6/14/19	ACT				B. Bennett	BURC	
356025	Channel Master	NYD042457788	00	Create on 03252013	6/25/19	ACT	Order	PC	2/6/18	2/29/48	J. Spellman	BURC
442038	Ashland Distribution	NYD046877775	00	site management	5/29/19	ACT	Order	CA	4/8/17		M. Maccabe	BURB
447007	Schenectady International -10th St Plant	NYD002070100	00	Site Management	8/19/19	ACT	Order	CA	12/5/91		K. Sarnowicz	BURB
546003	General Electric - Waterford	NYD002080034	00	Site-wide Groundwater Monitoring	8/9/19	ACT	Permit	OP	3/1/16	2/28/21	S. Malsan	
645009	Reynolds Metals Company	NYD002245967	01	IND LF&FORMER POTL	9/16/19	ACT	Order	CA	9/8/87		K. Hale	BURC

RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2019/2020				GPRA/Non-GPRA: Both (GPRA and Non-GPRA)							
Report Period: 4/1 - 9/30				End Status: Actual							
704045	Triple Cities Metal Finishing	NYD002226041	00	Site Management	5/28/19	ACT				G. Priscott	BURD
709001	Borden Chemical	NYD000691865	00	Site Management	5/8/19	ACT	Order CA	11/21/90		J. Gaylord	BURE
734013	Quanta Resources	NYD980592448	00	Site Management	9/10/19	ACT				C. Mannes	BURD
828061	Bausch and Lomb	NYD002207744	00	Site Management	4/3/19	ACT				F. Sowers	BURE
828095	Rochester Gas & Electric - Brooks Ave.	NYD000818781	00	Create on 03252013	5/24/19	ACT	Permit CA	9/23/15	9/22/25	G. Dieter	BURE
828177	Eastman Kodak Co.- Eastman Business Park	NYD980592497	00	Site Management	4/30/19	ACT	Permit OP	1/26/15	1/25/20	L. Gorton	BURE
915244	General Electric Buffalo Service Shop	NYD067539940	00	Site Management	6/20/19	ACT	Permit CA	7/5/12	7/4/22	J. Laclair	BURD
932030B	AKZO Chemicals Inc.	NYD043815158	00	Site Management	5/15/19	ACT	Permit CA	8/10/11	8/9/21	B. Sadowski	BURE
932039	Vanchlor Company, Inc.	NYD991290529	00	Site Management	5/16/19	ACT	Order PC	7/10/14		S. Moeller	BURE
932096	Solvent Chemical	NYD000824466	00	Site Management	6/26/19	ACT	Order CA	10/8/97		B. Sadowski	BURE
Non-GPRA Count:				4							
Planned:				0							
Actual:				4							
GPRA Count:				17							
Planned:				0							
Actual:				17							
Total - Periodic Review				21							
Planned:				0							
Actual:				21							

Interim Site Management

CA 677 ICM Effectiveness Evaluation - *See Note Below

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<u>GPRA</u>											
915002	Allied Chemical, R & D Facility	NYD000632315	03	Corrective Action -SITEWIDE	6/21/19	ACT	Order CA	11/10/12		J. Vaccaro	BURE

RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends:	2019/2020	GPRA/Non-GPRA:	Both (GPRA and Non-GPRA)
Report Period:	4/1 - 9/30	End Status:	Actual
<hr/>			
Non-GPRA Count:	0		
Planned:	0		
Actual:	0		
GPRA Count:	1		
Planned:	0		
Actual:	1		
Total - Interim Site Management	1		
Planned:	0		
Actual:	1		
<hr/>			

Attachment 4
RCRA Sitewide Reporting

Fiscal Year: 2019/2020

4/1 - 9/30

CA400,CA550,CA725,CA750,CA900,CA999,RAU

CA 400 Sitewide Remedy Selection

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
413013	Boiler Room Area (Ampheno	NYD001827633	BURB	Y	09/27/2019	Actual

CA 550 Sitewide Construction

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
130004	RUCO Polymer Corp. (Hook	NYD002920312	BURA	N	06/10/2019	Actual
336065	Tarkett	NYD041770629	BURC	N	08/06/2019	Actual
413013	Boiler Room Area (Ampheno	NYD001827633	BURB	Y	09/27/2019	Actual

CA 725 Human Exposures Controlled

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
915040	Mobil Oil Corporation	NYD002107019	BURE	Y	09/30/2019	Actual

CA 750 Groundwater Mitigation Controlled

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
915040	Mobil Oil Corporation	NYD002107019	BURE	Y	09/30/2019	Actual

CA 900 Performance Standard Attained

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
828079	Stuart-Olver-Holtz	NYD002215341	BURE	Y	07/31/2019	Actual
907019	D.C. (Dow Craft) Rollform	NYD002123727	BURE	N	04/05/2019	Actual
915184	Buffalo Color Plant Site	NYD080335052	BURE	Y	04/01/2019	Actual

CA 999 CA Process Completed

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
336065	Tarkett	NYD041770629	BURC	N	08/06/2019	Actual

CA 800 RAU Ready for Anticipated Use

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
130004	RUCO Polymer Corp. (Hook	NYD002920312	BURA	N	06/28/2019	Actual
241130	LIRR - Morris Park Repair	NYD980641625	BURB	Y	09/26/2019	Actual
336065	Tarkett	NYD041770629	BURC	N	08/06/2019	Actual
828079	Stuart-Olver-Holtz	NYD002215341	BURE	Y	07/29/2019	Actual

Attachment 5 - Operating, Post Closure and Corrective Action Permit Universe

CORRECTIVE ACTION ONLY							
Site No	Site Name	RCRA ID	Permit Expires	Enf Doc	Expected Issue	Issued	CA Complete
1 130003	Grumman Aerospace-Bethpage Fac.	NYD002047967	8/2/2012	Convert to Order	9/30/2020	No	
2 152015	Chemical Pollution Control	NYD082785429	6/21/2015	Convert to Order	12/31/2019	SM order expected	
3 152136	Us Navy, Nwlrp Calverton	NYD003995198	8/2/2022	Permit	12/31/2022	No	
4 152154	Safety-Kleen Corp. – N. Amityville	NYD000708198		Convert to Order	3/31/2021	No	
5 241018	Safety-Kleen Corp. – Woodside	NYD980785760	N/A	N/A	N/A	CA999-2/7/2013	Yes
6 314004	Texaco Research	NYD091894899	N/A	Convert to Order	N/A	10/31/2013	No
7 314054	Ibm Corporation - East Fishkill	NYD000707901	11/1/2021	Permit	12/31/2022		Yes
8 336006	Nepera Inc. – Harriman	NYD002014595	N/A	Order	N/A	5/29/2014	No
9 336028	Majestic Weaving Corporation	NYD001701382	N/A	Order	N/A	1/18/2012	Yes
10 344003	Wyeth Pharmaceuticals	NYD054065909	9/29/1998	Order	N/A	7/21/2015	Yes - Corrective Action Order
11 356001	Hercules Inc. (DynoNobel)	NYD000799122	9/22/2005	Order	N/A	7/24/2018	No - Needs Order after ROD/SB
12 356025	Channel Master (Avnet)	NYD042457788	3/31/1996	Convert to Order	N/A	2/6/2018	No, also PC
13 442038	Ashland Distribution	NYD046877775	N/A	Order	N/A	6/19/1992	No, 3008 (h) order
14 447001	Schenectady International	NYD002070118	9/4/2017	Permit	N/A	8/31/2018	No
15 447004	G.E. Main Plant	NYD002084135	N/A	RD/RA Order	N/A	11/9/2006	No, orders in eDocs
16 447005	G.E. Riverview Plant	NYD052987096	N/A	RD/RA Order	N/A	12/16/2013	No
17 447011	Usdoe - Separations Proc Res Unit	NYR000096859	9/28/2018	Permit	1/31/2020		No
18 510018	Wyeth Pharmaceuticals Inc	NYD002081396	3/3/2019	Permit	12/31/2020		Yes
19 558004	G.E. Fort Edward Plant Site	NYD093256063	N/A	Order	N/A	multiple	No, orders in edocs
20 704025	Ashland Chemical	NYD049253719	N/A	Convert to Order	N/A	4/5/2013	No
21 734065	Martin Marietta - Electronics Park	NYD059385120	N/A	Order	N/A	12/26/1997	No, state order for CA
22 734125	Niagara Mohawk	NYD000730382	6/30/1999	Convert to Order	N/A	11/20/2015	No
23 738037	NIMO - 9 Mile Point #1 and #2	NYD000730432	N/A	N/A	N/A	CA999-2/27/2014	Yes
24 754006	Lockheed Martin (Former IBM)	NYD986874501	3/29/2020	Permit	9/30/2020		No
25 828003	Fmr G.E. and Black & Decker Site	NYD002221919	2/11/1999	Permit	12/31/2020		No, also PC
26 828064	Delphi Automotive Systems	NYD002215234	N/A	RD/RA Order	12/31/2019		No
27 828095	RG&E Brooks Ave.	NYD000818781	9/22/2025	Permit	N/A	9/23/2015	No
28 828099	Valeo Fmr GM - Delco Fac.	NYD002215226	N/A	RD/RA Order	N/A	10/3/2016	No
29 850003	GTE Products Corp. (Phillips)	NYD002246015	N/A	Order	N/A	10/17/2019	No
30 859029	R. E. Ginna Nuclear Power Plant	NYD000692376	N/A	N/A	N/A	CA999-2/27/2014	Yes
31 905005	Western NY Nuclear Serv Ctr.	NYD986905545	N/A	Order	12/31/2020		No, expect to update 1992 order
32 905039	US Dept. of Energy- West Valley	NYD980779540	N/A	Permit	12/31/2020		No, expect CA module in storage permit
33 915002	Honeywell Buffalo Research Lab	NYD000632315	N/A	Convert to Order	N/A	11/1/2012	No
34 915144	Niagara Mohawk Dewey Ave. Serv	NYD000730390	N/A	Order	N/A	11/12/1997	No
35 915244	GE Buffalo	NYD067539940	7/4/2022	Permit	1/4/2023		No

36	932019	Occidental Chemical Corporation	NYD000824482	9/28/2018	Permit	2/15/2020		No
37	932106	914th Airlift Wing	NY0570024273	3/8/2015	Convert to Order	N/A	8/22/2016	No
38	932030B	Akzo Nobel Polymer Chemicals Llc	NYD043815158	8/9/2021	Permit	12/31/2021		No

POST CLOSURE

Site No	Site Name	RCRA ID	Permit Expires	Enf Doc	Expected Issue	Issued	PC Complete
39	413018	Amphenol Corp. Bendix Conn	NYD981133184	2/15/1996	Terminate Permit	N/A	Yes, permit was extinguished in 2015 with no need for an order going forward
40	314004	Texaco Research	NYD091894899	N/A	Order	N/A	No
41	336008	Cornwall Properties, LLC	NYD001223338	8/18/1999	Convert to Order	N/A	No
42	356002	IBM - Kingston	NYD001359694	N/A	Order	N/A	No
43	356025	Channel Master (Avnet)	NYD042457788	3/31/1996	Convert to Order	N/A	No
44	360044	Safety-Kleen Corp. - Thornwood	NYD000708172	11/11/2008	Convert to Order	12/31/2019	No
45	401002	Sabic Inovative Plastics Us, L	NYD066832023	N/A	Order	N/A	No
46	546003	MPM Silicones, LLC	NYD002080034	1/12/2004	Permit	see Operating	PC module in operating permit
47	557004	Hercules/Ciba	NYD000818419	11/25/2014	Permit	N/A	No
48	557011	BASF (Ciba Specialty Chem)	NYD002069748	3/5/2025	Permit	9/5/2025	No
49	633022	Industrial Oil Tank Site	NYD095577342	N/A	N/A	N/A	CA 999 5/2013
50	734064	Metalico Aluminium Recovery	NYD000697086	N/A	Convert to Order	N/A	DEC decided no permit or order
51	828003	Black & Decker (U.S), Inc.	NYD002221919	2/11/1999	TSDF Permit	12/31/2020	No
52	905004	Moench Tanning	NYD002126910	N/A	Order	N/A	No
53	915009	Bethlehem Steel/Tecumsah	NYD002134880	N/A	Order	N/A	No, CMS order in place will need order after ROD issued
54	915254	PVS Chemical Solutions	NYD980534390	N/A	Convert to Order	12/31/2019	also 915004
55	932014	FMC Corporation	NYD002126845	N/A	Order	6/6/2019	
56	932039	Van De Mark Chem Co., Ind. LF	NYD991290529	N/A	Convert to Order	N/A	No
57	932045	Cwm Chemical Services, Llc	NYD049836679	8/20/2018	TSDF Permit	see Operating	PC module in operating permit

58	932046	CECOS International, Inc.	NYD080336241	11/3/2014	Permit	12/23/2026	10/25/2016	No
59	932052	Bell Aerospace Textron	NYD002106276	N/A	Convert to Order	N/A	1/26/2014	No
60	915012A	Buffalo Color Corp	NYD080335052	2/10/2000	Permit	N/A	N/A	No, either BCP agreements or orders in place

		<u>OPERATING</u>						
Site No	Site Name	RCRA ID	Permit Expires	Enf Doc	Expected Issue	Issued	Closed	
61	130078	Hicksville Operations Center	NYD006866008	6/19/2018	Permit	12/31/2019	No	
62	152009	Brookhaven National Laboratory	NY7890008975	9/6/2027	Permit	12/31/2027	9/7/2017	No
63	152015	Chemical Pollution Control	NYD082785429	6/21/2015	Permit	N/A		Closed 2015
64	241003	Triumvirate Environmental	NYD077444263	12/20/2022	Permit	12/31/2023		No
65	241012	Con Edison - Astoria	NYD980593636	7/7/2018	Permit	6/1/2020		No
66	314001	Ibm Corporation - Poughkeepsie	NYD080480734	11/15/2019	Permit	12/31/2020		No
67	336053	Revere Smelting And Refining Corp.	NYD030485288	7/30/2027	Permit	12/31/2027	6/30/2017	No
68	356045	Central Hudson Gas And Electric	NYD000705905	8/31/2020	Permit	12/31/2020		No
69	360040	Ibm Thomas J Watson Research	NYD084006741	1/31/2023	Permit	12/31/2023		No
70	401041	Norlite Corporation	NYD080469935	12/31/2020	Permit	7/6/2021		No
71	401043	Safety-Kleen Systems - Cohoes	NYD986872869	3/9/2026	Permit	9/30/2026		No
72	447013	General Electric Global Research	NYD071094197	1/9/2022	Permit	12/31/2022		No
73	447017	U.S.D.O.E. KAPL-Knolls Site	NY6890008992	7/29/2022	Permit	12/31/2022		No
74	546003	Mpm Silicones, Llc	NYD002080034	2/28/2021	Permit	8/31/2021		No
75	546038	U.S.D.O.E. KAPL-Kesselring Site	NY5890008993	12/12/2023	Permit	12/31/2024		No
76	704025	Nexio Solutions	NYD049253719	5/29/2023	Permit	12/31/2023		No
77	734061	Safety-Kleen Systems Dewitt	NYD982743312	9/13/2022	Permit	12/31/2023		No
78	734063	Solvents And Petroleum Service	NYD013277454	3/4/2023	Permit	12/31/2023		No
79	826006	Arkema Inc.	NYD002218436	7/9/2029	Permit	N/A	7/10/2019	No
80	826015	Safety-Kleen Systems -Avon	NYD980753784	4/22/2024	Permit	12/31/2024		No
81	828177	Eastman Kodak Company	NYD980592497	1/25/2020	Permit	7/25/2020		No
82	828178	Xerox Corporation	NYD002211324	5/30/2022	Permit	12/31/2022		No
83	915161	Safety-Kleen Systems Inc	NYD981556541	3/28/2023	Permit	12/31/2023		No
84	932040	Durez Corporation	NYD002103216	3/20/2018	Permit	5/31/2020		No
85	932045	Cwm Chemical Services, Llc	NYD049836679	8/20/2018	Permit	3/31/2020		No
86	932045	CWM - Permit Mod for RMU#2	NYD049836679		Modification	3/31/2020		No